

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
IRIS WEINSTEIN HAGGAI, on her own behalf :  
and on behalf of JUDITH LYNNE WEINSTEIN :  
HAGGAI and GAD HAGGAI, JOHN DOE, :  
RICHARD ROE, JANE MOE, SHLOMI ZIV, :  
AYELET SAMERANO, on her own behalf and on :  
behalf of YONATAN SAMERANO, :  
TALIK GVILI, on her own behalf and on behalf of :  
RAN GVILI, ROEE BARUCH, on his own behalf :  
and on behalf of URIEL BARUCH, and :  
JAMES POE, on his own behalf and on behalf of :  
LEO POE, :

Plaintiffs, :

– *against* – :

NERDEEN KISWANI, individually and as the :  
representative of WITHIN OUR LIFETIME- :  
UNITED FOR PALESTINE, MARYAM ALWAN, :  
individually and as the representative of :  
COLUMBIA STUDENTS FOR JUSTICE IN :  
PALESTINE, CAMERON JONES, individually :  
and as the representative of COLUMBIA- :  
BARNARD JEWISH VOICE FOR PEACE, and :  
MAHMOUD KHALIL, individually and as the :  
representative of COLUMBIA UNIVERSITY :  
APARTHEID DIVEST, COLUMBIA :  
STUDENTS FOR JUSTICE IN PALESTINE, and :  
COLUMBIA-BARNARD JEWISH VOICE FOR :  
PEACE :

Defendants. :

25 Cv. 2400 (JAV)

DECLARATION IN SUPPORT  
OF DEFENDANT  
MAHMOUD KHALIL’S MOTION  
TO DISMISS THE SECOND  
AMENDED COMPLAINT IN HIS  
PERSONAL AND ALLEGED  
REPRESENTATIVE CAPACITIES

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JOSHUA L. DRATEL, pursuant to 28 U.S.C. §1746, hereby affirms under penalty of  
perjury:

1. I am a lawyer, and along with Amy E. Greer, Esq., represent defendant Mahmoud Khalil in the above-captioned case in his individual and alleged representative capacities. I make this Declaration on Mr. Khalil's behalf in support of his motion, pursuant to Rules 12(b)(1), Rule 12(b)(5), and Rule 12(b)(6), Fed.R.Civ.P., to dismiss Plaintiffs' Second Amended Complaint ("SAC").

2. As detailed and explained in the accompanying Memorandum of Law, there are multiple reasons why Defendants' motion should be granted. Filed herewith are a Notice of Motion and a Memorandum of Law in support of these motions. The bases for the motion are set forth in detail in the accompanying Memorandum of Law, and it is respectfully requested that the facts set forth within the Memorandum of Law be incorporated by reference in this Declaration.

WHEREFORE, it is respectfully requested that the Court grant Mr. Khalil's Motion to Dismiss in its entirety, and dismiss the SAC with prejudice.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. 28 U.S.C. §1746. Executed August 4, 2025.

/S/ Joshua L. Dratel  
JOSHUA L. DRATEL